

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
STEVEN M. HARKINS,
ESQ.**

STEVEN M. HARKINS, ESQ., being of full age, certifies as follows:

1. I am a Shareholder at Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis Pharma, Inc., and Actavis LLC. I make this Certification based on personal knowledge and in support of Defendants' Reply Memorandum of Law In Support of Joint Motion to Exclude the Opinions of Philip Russ.

2. Attached hereto as Exhibit A is a true and accurate copy of Exhibit 27 to the deposition of Phillip James Russ, in MDL 2875, dated January 5, 2023. This document has been filed under seal because it contains information that has been designated as "PROTECTED INFORMATION" as defined in the applicable Amended Confidentiality and Protective Order [[ECF No. 1661](#)].

3. Attached hereto as Exhibit B is a true and accurate copy of Exhibit 28 to the deposition of Phillip James Russ, in MDL 2875, dated January 5, 2023. This

document has been filed under seal because it contains information that has been designated as “PROTECTED INFORMATION” as defined in the applicable Amended Confidentiality and Protective Order [[ECF No. 1661](#)].

4. Attached hereto as Exhibit C is a true and accurate copy of Plaintiffs’ First Set of Requests for Production of Documents to All API and Finished-Dose Manufacturing Defendants, in MDL 2875, dated August 30, 2019.

5. Attached hereto as Exhibit D is a true and accurate copy of the Oral Opinion Deciding the Parties' "Macro" Issues Listed in the October 22, 2019 Order, dated November 20, 2019.

6. Attached hereto as Exhibit E is a true and accurate copy of the transcript of a Case Management Conference in MDL 2875 held on December 11, 2019.

7. Attached hereto as Exhibit F is a true and accurate copy of the Document Production Transmittal Letter of Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries, Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd., in MDL 2875, dated July 15, 2020.

8. Attached hereto as Exhibit G is a true and accurate copy of Layne C. Hilton’s Letter to Seth A. Golberg Regarding Prioritized Discovery, in MDL 2875, dated May 7, 2020.

9. Attached hereto as Exhibit H is a true and accurate copy of an excerpt of the transcript of the deposition of Sushil Jaiswal, Ph.D., in MDL 2875, dated June 5, 2021.

Dated: April 25, 2023

Respectfully submitted,

/s/ Steven M. Harkins

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and Actavis LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2023, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Steven M. Harkins
Steven M. Harkins